

1 The Honorable Richard A. Jones  
2  
3  
4  
5  
6  
7  
8

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 GETTY IMAGES, INC., a Delaware  
10 Corporation,

11 Plaintiff,

12 vs.

13 ROXANNE MOTAMEDI, an individual,

14 Defendant.

Case No. 2:16-cv-1892

15 DECLARATION OF HEATHER  
16 CAMERON IN SUPPORT OF  
17 PLAINTIFF'S MOTION FOR  
18 SUMMARY JUDGMENT

19 I, Heather Cameron, declare as follows:

20 1. I am a paralegal employed by a wholly owned subsidiary of Getty Images, Inc. I  
21 have worked in Getty Images' legal department for more than 18 years. I am over 18 years of  
22 age, am competent to testify and I have personal knowledge of the facts set forth in this  
23 declaration.

24 2. I have reviewed accounting records and emails sent to/from Ms. Motamedi  
25 relating to holiday gifts she sent or authorized to be sent at Getty Images' expense to key clients  
26 in the last few months of her employment with Getty Images. Attached hereto as Exhibit 1 is a  
27 true and correct copy of a list of holiday gifts Ms. Motamedi sent or authorized to be sent at  
28 Getty Images' expense to key clients in the last few months of her employment with Getty  
Images.

29 //

30 //

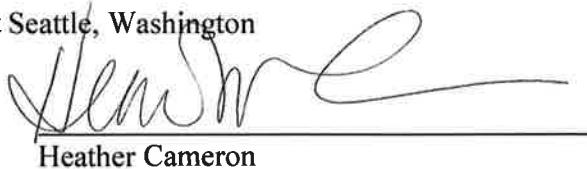
31 //

32 DECLARATION OF HEATHER CAMERON IN SUPPORT OF  
33 PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT - 1  
34 Case No. 16-CV-1892

35 SEBRIS BUSTO JAMES  
14205 S.E. 36<sup>th</sup> Street – Suite 325  
36 Bellevue, Washington 98006  
37 (425) 454-4233

1  
2 I declare under penalty of perjury under the laws of the State of Washington that the  
3 foregoing is true and correct.

4 DATED this 31<sup>st</sup> day of October, 2017 at Seattle, Washington



5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
Heather Cameron

DECLARATION OF HEATHER CAMERON IN SUPPORT OF  
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT - 2  
Case No. 16-CV-1892

SEBRIS BUSTO JAMES  
14205 S.E. 36<sup>th</sup> Street – Suite 325  
Bellevue, Washington 98006  
(425) 454-4233

# **Exhibit 1**

**CLIENTS THAT MS MOTAMEDI SENT CHRISTMAS GIFTS TO AT GETTY'S EXPENSE**

	<b>Name</b>	<b>Company</b>
1.	Amy Cusack	Sorel
2.	Camille Orlandi	Gucci
3.	Greg Baldwin	EMAs
4.	Gaye Ann Bruno	CBS
5.	Rich Kosters	Fox
6.	Emily Weisenberger	Fox
7.	Barbara Lake	Fox
8.	Ana Torres	Disney
9.	Maureen O'Connor and Eileen Thompson	Rogers & Cowan
10.	Alex Lippin and Jennifer Price	Lippin Group
11.	Roxy Campos	Sony
12.	Nancy Walsh and Annie Buck	Chanel
13.	Simona Chiappa	Prada
14.	Stephanie Labeille	Cartier
15.	Michael Mand	CAA
16.	Stephanie Murphy	NBC
17.	Andy Gelb	Slate / SGP
18.	Michael Samonte	Sunshine Sachs
19.	Bob Jeffrey	JWT
20.	Steve Wilson	BWR
21.	Beth Kseniak, Chris Donnellan and Ivan Shaw	Conde Nast / Vanity Fair
22.	Beth Mitchell	InStyle

23.	Ellen Schultz	HBO
24.	Teni Melidonian	AMPAS
25.	Esther Song	Tory Burch
26.	Stephanie Murphy	Access Hollywood
27.	Munawar Hosain	
28.	Marie Norrington	Mandarin Oriental PR
29.	Milan Blagojeviv	Full Picture PR Agency
30.	Theresa Coffino	Extra